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8 Attorneys for Defendants  
BLOCK, INC. and CASH APP INVESTING, LLC

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10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA

12 MICHELLE SALINAS and RAYMEL  
13 WASHINGTON, individually and on behalf of  
all others similarly situated,

14 Plaintiffs,

15 v.

16 BLOCK, INC. and CASH  
17 APP INVESTING, LLC,

18 Defendants.  
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Case No. 3:22-cv-04823-AMO

**STIPULATION PURSUANT TO CIVIL  
L.R. 6-1(B) AND [PROPOSED] ORDER  
TO MODIFY CASE SCHEDULE**

Judge: Hon. Araceli Martinez-Olguin

STIPULATION AND [PROPOSED] ORDER  
TO MODIFY CASE SCHEDULE  
3:22-cv-4823-AMO

Pursuant to Local Rules 6-1(b) and 6-2, Plaintiffs Michelle Salinas and Raymel Washington (“Plaintiffs”) and Defendants Block, Inc. and Cash App Investing, LLC (the “Parties”), by and through the undersigned counsel, hereby stipulate and agree to the following proposed modification of the case schedule:

WHEREAS, the Complaint (ECF No. 1) was filed in this action on August 23, 2022;

WHEREAS, the parties have previously stipulated, and the Court has approved, that the time for Defendants to answer or otherwise respond to the Complaint be extended to February 3, 2023 (ECF Nos. 22, 25, 33, 34, 39, 40);

WHEREAS, a complaint was filed in an action captioned *Gordon v. Block Inc. and Cash App Investing, LLC*, No. 22-cv-6787 (N.D. Cal.) on November 2, 2022;

WHEREAS, on December 6, 2022, the Court ordered that this matter and *Gordon* be Related (ECF No. 41);

WHEREAS, on December 15, 2022, Defendants filed a motion to consolidate the *Salinas* and *Gordon* actions that is opposed by Plaintiff Gordon (ECF No. 42);

WHEREAS, the Parties previously stipulated to: (1) continue the hearing on Defendants’ motion to consolidate pending mediation; and (2) if the Court granted Defendants’ motion to consolidate, to extend the deadline for Defendants to answer or otherwise respond until 30 days after the filing of a consolidated complaint; or (3) if the Court denied Defendants’ motion to consolidate, to extend the deadline for Defendants to answer or otherwise respond to the Complaint until 30 days after the Court’s denial of the motion (ECF No. 50);

WHEREAS, the Court vacated the hearing on Defendants’ motion to consolidate and set a case management conference for May 11, 2023 (ECF No. 51);

WHEREAS, the Parties engaged in mediation in an attempt to reach an early resolution of this action on April 24, 2023 and are actively continuing those discussions;

WHEREAS, on May 1, 2023, to facilitate continuing discussions concerning the possibility of early resolution, the Parties stipulated, and the Court approved, that the Case Management Conference previously scheduled for May 11, 2023, be continued to July 13, 2023, and that the

action was otherwise be stayed through the completion of the Case Management Conference (ECF Nos. 54 and 55);

WHEREAS, pursuant to this Court's Order Reassigning Case (ECF No. 57), this case was reassigned to the Honorable Araceli Martinez-Olguin in the San Francisco division for all further proceedings; all then-existing dates were vacated; and the Parties are required to file a Joint Case Management Statement on or before May 31, 2023;

WHEREAS, the Parties plan to continue discussions regarding the possibility of early resolution and believe this action should be stayed while the Parties engage in those discussions;

Plaintiffs and Defendants hereby stipulate that:

- The Joint Case Management Statement shall be due on **July 6, 2023**.
- The Case Management Conference previously vacated shall be rescheduled by the Court to **July 13, 2023, at 10:00 a.m.** via Zoom video conference.
- The action is otherwise stayed through the completion of the Case Management Conference.

**IT IS SO STIPULATED.**

Dated: May 31, 2023

By: /s/ Aravind Swaminathan  
 Aravind Swaminathan  
 ORRICK, HERRINGTON & SUTCLIFFE LLP  
 Attorneys for Defendants  
 Block Inc. and Cash App Investing LLC

By: /s/ Gary Graifman  
 Gary Graifman  
 KANTROWITZ GOLDHAMER & GRAIFMAN, P.C.  
 Attorneys for Plaintiffs

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**Attestation re Electronic Signatures**

I, Aravind Swaminathan, attest pursuant to Northern District Local Rule 5-1(i)(3) that all other signatories to this document, on whose behalf this filing is submitted, concur in the filing's contents and have authorized this filing. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: May 31, 2023

By: /s/ Aravind Swaminathan  
ARAVIND SWAMINATHAN